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April 15, 2025

Via ECF

Honorable Arun Subramanian
United States District Judge
United States District Court
Southern District Of New York
500 Pearl Street, Courtroom 15A
New York, NY 10007

Re: Tavira Escalon et al v. Anva LLC et al; 24-cv-07412-AS

Dear Judge Subramanian:

We represent Plaintiff in the above-referenced matter and write, on behalf of the parties, to request a two-week extension of the deadline to submit settlement papers to the Court, currently scheduled for April 18, 2025. The parties also request the deadline to submit settlement papers be converted to a deadline to submit a Rule 68 offer of judgment (the “Offer”) and acceptance (the “Acceptance”). This is the first request of its kind and is submitted on consent. If granted, the extension would move the current deadline from April 18 to May 2, 2025.

The parties do not contemplate dismissal of this case under Rule 41. Rather, the parties will be resolving this matter through a Rule 68 offer of judgment pursuant to *Mei Xing Yu v. Hasaki Rest., Inc.*, 944 F.3d 395 (2d Cir. 2019). The parties anticipate they will be in a position to submit the Offer and Acceptance to the Court by May 2, 2025.

GRANTED. The Clerk of Court is respectfully directed to terminate the motion at ECF No. 23.

SO ORDERED.



Arun Subramanian, U.S.D.J.
Date: April 15, 2025

Respectfully Submitted,

/s/ Jesse Barton
Jesse Barton